

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**CURLING PLAINTIFFS' MOTION TO SEAL THEIR RESPONSE TO
SECURITY PROTOCOLS FOR REVIEW OF VOTE-STEALING
MALWARE AND THE AFFIDAVIT OF J. ALEX HALDERMAN**

Plaintiffs Donna Curling, Donna Price, and Jeffrey Schoenberg (the “Curling Plaintiffs”) seek to seal their Response to Security Protocols for Review of Vote-Stealing Malware (Doc. 496) and the Affidavit of J. Alex Halderman (Doc. 498). Public disclosure of the sensitive information regarding the malware Dr. Alex Halderman developed for demonstration purposes and the security issues involved with its production in the form proposed by Defendants would threaten the security of Georgia’s election system. For the reasons stated in the brief in support hereof, the Court should grant this Motion.

Dated: July 17, 2019

Respectfully submitted,

/s/ David D. Cross
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CERTIFICATE OF COMPLIANCE

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ David D. Cross
David D. Cross

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CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2019, a copy of the foregoing **Curling Plaintiffs' Motion to Seal Their Response to Security Protocols for Review of Vote-Stealing Malware and the Affidavit of J. Alex Halderman** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ David D. Cross
David D. Cross